

STATE OF TENNESSEE

Office of the Attorney General



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REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

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May 9, 2002

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Petition of Chattanooga Gas Company
For Approval of Tariff Modifying
PGA Rider
Docket No. 02-00383

Dear Mr. Waddell:

Enclosed is an original and thirteen copies of the Petition to Intervene in the above-referenced matter. Copies are being furnished to counsel of record for interested parties.

Sincerely,

VANCE L. BROEMEL
Assistant Attorney General

cc: Counsel of Record

POSTED
5/9/02

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:

PETITION OF CHATTANOOGA GAS COMPANY
FOR APPROVAL OF TARIFF MODIFYING
PGA RIDER

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DOCKET NO. 02-00383

PETITION TO INTERVENE

Comes the Office of the Attorney General & Reporter, through its Consumer Advocate and Protection Division (hereinafter "Attorney General"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this case. For cause the Petitioner would show as follows:

1. The Attorney General is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case, and participate or intervene in proceedings to represent the interests of Tennessee consumers in accordance with the Uniform Administrative Procedures Act (UAPA).

2. Chattanooga Gas Company (Chattanooga Gas") is a company regulated by the Tennessee Regulatory Authority ("TRA"). Chattanooga Gas provides natural gas to consumers in the Chattanooga, Tennessee area.

3. Chattanooga Gas has filed a Petition seeking changes in its tariff that would, in effect, create a "fixed rate" for the cost of gas it will purchase over the course of the year.

This fixed rate will form part of the consumer's monthly bill.

4. A portion of the "fixed rate" includes a risk premium set by Chattanooga Gas to cover the risk that the cost of gas it has to purchase during the course of the year exceeds the fixed rate. Based on the review of the proposed tariff, this risk premium is too high and is not reasonable for consumers in Chattanooga.

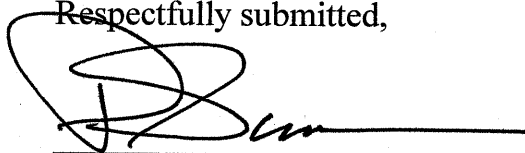
5. In addition, the tariff has no option for consumers. That is, all consumers will be under the plan whether they want to or not. This is not the kind of consumer choice Tennesseans should expect.

6. Accordingly, the Attorney General seeks to intervene in order to oppose the proposed tariff and protect the public interest.

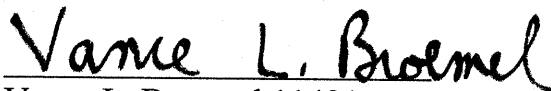
WHEREFORE, the Petitioner prays the TRA to grant its Petition to Intervene.

THIS the 9th day of May, 2002.

Respectfully submitted,



Paul G. Summers, 6285
Attorney General and Reporter



Vance L. Broemel, 11421
Assistant Attorney General
Consumer Advocate and Protection Division
John Sevier Building, Third Floor
425 Fifth Avenue, North
Nashville, TN 37243-0500
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Certificate of Service

I hereby certify that a true and correct copy of the Petition to Intervene was served on parties below via U. S. Mail, postage prepaid, this May 9th, 2002.

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